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October 22, 1993

By Federal Express**Ms. Margo T. Oge****Director****Office of Radiation and Indoor****Air Programs****U.S. Environmental Protection Agency****Mail Code - 6601J****401 M Street, S.W.****Washington, D.C. 20460****Re: West Chicago Superfund Sites****Dear Ms. Oge:**

We have previously exchanged correspondence with regard to the radium-in-soil cleanup standards that Region 5 proposes for certain CERCLA sites in West Chicago, Illinois. I know that there is an extensive national debate as to whether to establish a cleanup criterion of 5 pCi/g above background for buried radium contamination. I am writing because I am fearful that your office may not have appreciated that the national debate over radium cleanup standards is largely irrelevant in the circumstances that are presented by the West Chicago sites.

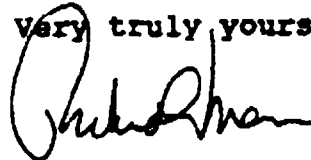
As you know, the EPA analyses of appropriate standards for radium contamination have focused on the risks that might arise from the inhalation of radon daughters. The analyses assume that the radium contamination is radium-226. As it happens, however, the radium contamination at issue in West Chicago is predominantly radium-228. Because the two isotopes have very different physical properties and present different health risks, it is not scientifically appropriate to apply analyses for radium-226 in the West Chicago circumstances. Indeed, because of the far lesser inhalation risk presented by radium-228, a far more lenient standard should be established for radium-228 than for radium-226. I enclose copies of correspondence with Region 5 that discuss the point more fully.

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I understand that your office is now reviewing Region 5's final draft of a document setting out cleanup criteria for the West Chicago sites. I hope that your office can assist Region 5 in addressing the radium-in-soil standard in an appropriate manner.

Very truly yours,



Richard A. Meserve

Counsel for Kerr-McGee
Chemical Corporation

Enclosures